

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EDWIN VERAS,

Plaintiff,

07 Civ. 11172 (CLB)

-against-

CITY OF NEW ROCHELLE, ARAZ
ALALI, JOHN AND JANE DOES
1 THROUGH 10,

ANSWER

Defendants.

Jury Trial Demanded

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Defendant ARAZ ALALI, by his attorneys Lovett & Gould, LLP, for his answer respectfully states:

1. Denies paragraphs "8", "10", "11", "12", "13", "14", "15", "16", "18", "19", "20", "21", "22", "24", "25", "27", "28", "29", "31", "32", "34", "35", "37", "38", "40", "42", "43", "45", "46", "47", "48", "49", "50", "51", "52", "53", "61", "62", "64", "65", "67", "68", "69", "70", "71", "73", "74", "76", "77", "79", "80", "82", "83", "85", "87", "89", and "90".

2. Denies knowledge or information sufficient to form a belief as to the truth of the allegations of fact contained in paragraphs "6", "55", "56", "57", "58", and "59".

3. Repeats and realleges as if fully set forth with respect to paragraph "17", paragraphs "1" to "16", inclusive.

4. Repeats and realleges as if fully set forth with respect to paragraph "23", paragraphs "1" through "22", inclusive.

5. Repeats and realleges as if fully set forth with respect to paragraph “26”, paragraphs “1” through “25, inclusive.

6. Repeats and realleges as if fully set forth with respect to paragraph “30”, paragraphs “1” to “29”, inclusive.

7. Repeats and realleges as if fully set forth with respect to paragraph “33”, paragraphs “1” to “32”, inclusive.

8. Repeats and realleges as if fully set forth with respect to paragraph “36”, paragraphs “1” to “35”, inclusive.

9. Repeats and realleges as if fully set forth with respect to paragraph “39”, paragraphs “1” to “38”, inclusive.

10. Repeats and realleges as if fully set forth with respect to paragraph “41”, paragraphs “1” to “40”, inclusive.

11. Repeats and realleges as if fully set forth with respect to paragraph “44”, paragraphs “1” to “43”, inclusive.

12. Repeats and realleges as if fully set forth with respect to paragraph “54”, paragraphs “1” to “53”, inclusive.

13. Repeats and realleges as if fully set forth with respect to paragraph “60”, paragraphs “1” to “59”, inclusive.

14. Repeats and realleges as if fully set forth with respect to paragraph “63”, paragraphs “1” to “62”, inclusive.

15. Repeats and realleges as if fully set forth with respect to paragraph “66”, paragraphs “1” to “65”, inclusive.

16. Repeats and realleges as if fully set forth with respect to paragraph “72”, paragraphs “1” to “71”, inclusive.

17. Repeats and realleges as if fully set forth with respect to paragraph “75”, paragraphs “1” to “74”, inclusive.

18. Repeats and realleges as if fully set forth with respect to paragraph “78”, paragraphs “1” to “77”, inclusive.

19. Repeats and realleges as if fully set forth with respect to paragraph “81”, paragraphs “1” to “80”, inclusive.

20. Repeats and realleges as if fully set forth with respect to paragraph “84”, paragraphs “1” to “83”, inclusive.

21. Repeats and realleges as if fully set forth with respect to paragraph “86”, paragraphs “1” to “85”, inclusive.

22. Repeats and realleges as if fully set forth with respect to paragraph “88”, paragraphs “1” to “87”, inclusive.

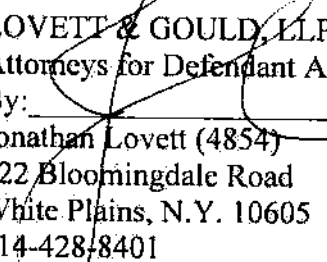
AS AND FOR A FIRST AFFIRMATIVE DEFENSE

23. Defendant is qualifiedly immune from suit.

WHEREFORE judgment is respectfully requested:

- a. Dismissing the complaint,
- b. Awarding against Plaintiff costs and reasonable attorney's fees, and,
- c. Granting such other and further relief as to the Court seems just and proper.

Dated: White Plains, N.Y.
January 17, 2008

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